

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: Joel Ryan Foster aka Joel R. Foster, aka Joel Foster,	:	BK No. 23-02422-MJC
	:	
Debtor(s)	:	
	:	
PENNYMAC LOAN SERVICES, LLC	:	CHAPTER 13
	:	
Movant	:	
v.	:	
Joel Ryan Foster aka Joel R. Foster, aka Joel Foster	:	
	:	
Debtor(s)	:	
and	:	
Jack N. Zaharopoulos	:	
	:	
Trustee	:	

**ANSWER TO MOTION OF PENNYMAC LOAN SERVICES, LLC
FOR RELIEF FROM THE AUTOMATIC STAY
UNDER SECTION 362**

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. After reasonable investigation Debtor does not have sufficient knowledge to admit these averments.
5. Denied. A legal conclusion to which no response is required.
6. Denied. After reasonable investigation Debtor does not have sufficient knowledge to admit these averments.
7. Denied. After reasonable investigation Debtor does not have sufficient knowledge to admit these averments.
8. Denied. A legal conclusion to which no response is required.
9. Denied. After reasonable investigation Debtor does not have sufficient knowledge to admit these averments.
10. Denied. A legal conclusion to which no response is required.

WHEREFORE, Debtor prays that an Order be entered denying the Motion for Relief.

Date: March 25, 2025

/s/ Robert J. Kidwell
Robert J. Kidwell, Esq.
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Stroudsburg, PA 18360
Attorneys for Debtor